

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 4:20-cr-00712-SRC
	)	
COURTNEY CURTIS,	)	
	)	
Defendant.	)	

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL,  
MOTION FOR APPOINTMENT OF PUBLIC DEFENDER, AND  
MOTION TO EXTEND DEADLINE FOR FILING RESPONSE TO PRESENTENCE  
INVESTIGATOIN REPORT**

COMES NOW defense counsel Talmage E. Newton IV, and for and in support of his motion to withdraw as counsel, and for appointment of new counsel, states as follows:

1. Defendant Courtney Curtis has instructed counsel to cease work on his file, move to withdraw, and request on his behalf that the Court appointment him a public defender.
2. A CJA-23, completed and executed by Defendant Courtney Curtis, will be concurrently filed under seal.
3. Defendant has a deadline of January 13, 2021 (tomorrow), by which to file any objections to the draft pre-sentence investigation report (DCD\_15). Counsel requests that deadline be extended by 14-days, through and including January 25, 2021, while this matter is addressed by the Court.
4. Counsel for the Government has been informed that counsel would be seeking leave to withdraw.

5. To the extent the Court seeks further explanation regarding the Defendant's request, defense counsel asks that such proceedings occur ex parte so as to protect the interests of Mr. Curtis.

WHEREFORE, Counsel respectfully requests that he be granted leave to withdraw as counsel; that the defendant be appointed counsel; that the deadline for filing a response to the pre-sentence investigation report be extended through January 25, 2021; and for such further relief as the Court may deem just and proper in the premises.

Respectfully submitted,

NEWTON BARTH, L.L.P



By:

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Attorney for Defendant

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was electronically served on all parties of record and filed with the court via the court's e-filing System on this 12<sup>th</sup> day of January, 2021.



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